

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ANDRE PARK, CELESTE VARGAS,
ALFREDO LARIOS SALVADOR, and
WILMER ADOLFO LARIOS SALVADOR,
individually and on behalf of all others similarly situated,

Plaintiff,

-against-

HANPOOL, INC., GAM MEE OK, INC., and
HYUNG K. CHOI,

Defendants.

23-cv-11309-VEC

**STIPULATION OF DISMISSAL WITH
PREJUDICE**

WHEREAS, the Settlement Agreement includes a provision for the Court to retain jurisdiction to enforce its terms, should enforcement become necessary.

WHEREAS, federal law permits district courts to expressly retain jurisdiction to enforce a settlement agreement, such that a breach of the agreement would violate the Court's dismissal order, thereby supporting the Court's exercise of ancillary jurisdiction.

WHEREFORE, the Parties hereby stipulate to the dismissal of this action with prejudice as to all Defendants and in its entirety, with each Party bearing its own attorneys' fees and costs, conditioned upon the Court issuing an order retaining jurisdiction to enforce the terms and conditions of the Settlement Agreement.

WHEREFORE, the Parties respectfully request that the Court incorporate the terms of the Settlement Agreement in its order and retain jurisdiction for the purpose of enforcement of the Settlement Agreement, should that become necessary.

Dated: 5/28/25

Attorneys for Plaintiffs

By: Clifford Tucker
Clifford Tucker, Esq.,
Sacco & Fillas LLP
31-19 Newtown
Astoria, New York 11102
Ph: 718-269-2243
CTucker@SaccoFillas.com

Dated: 5/28/2025

Attorneys for Defendants

By: Diane Hwakyung Lee
Diane Hwakyung Lee
The Law Offices of Diane H. Lee
1630 Center Avenue
Fort Lee, NJ 07024

ORDER

In accordance with the above stipulation, and for good cause shown, it is hereby ordered that this action is dismissed with prejudice as to all Defendants and in its entirety, with each Party to bear their own attorneys' fees and costs. However, the terms of the Settlement Agreement, a true and correct copy of which is attached hereto as Exhibit 1, are hereby incorporated into this order. The Court shall retain jurisdiction over the Parties to enforce the terms and conditions of the Settlement Agreement and the accompanying Stipulation.

Dated: May 29, 2025

The Clerk of the Court is respectfully
directed to close this case.

SO ORDERED:


